

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ALABAMA
EASTERN DIVISION

FILED

CANDACE ALEXANDER,
Plaintiff,

v.

JAMEKA SCALES, *et al.*,
Defendants.

2025 AUG -8 A 10:00

U.S. DISTRICT COURT
N.D. OF ALABAMA
Case No. 1:25-cv-980-CLM

JCN

**MOTION TO STRIKE DEFENDANTS' ANSWERS AND FOR DEFAULT
JUDGMENT**

Plaintiff moves this Court to strike the purported "answers" filed by Defendants Jameka Scales, Corey Bennett, Patrick Bennett, and Vickie Bennett (Docs. 29, 26, 27, 28) under Fed. R. Civ. P. 12(f) and 8(b), and to enter default judgment under Rule 55(b), for the following reasons:

I. DEFENDANTS' FILINGS FAIL TO COMPLY WITH RULE 8(b)**1. No Paragraph-by-Paragraph Response**

Rule 8(b)(1)(B) requires a party to "admit or deny the allegations asserted against it by an opposing party." None of the Defendants admitted or denied each numbered paragraph of the Complaint. Instead, they filed substantially identical narratives consisting of conclusory statements and broad denials.

2. No Legal Authority Cited

Not a single Defendant cites a rule, statute, or case law in support of their position. The filings rely solely on personal opinions and unsupported accusations, which do not meet the standard of "short and plain" defenses under Rule 8(b)(1)(A).

3. Effect of Rule 8(b)(6)

Under Rule 8(b)(6), any allegation not properly denied is deemed admitted. As shown in the tables that follow, Defendants failed to directly address numerous allegations. Those allegations are now admitted as a matter of law.

4. Procedurally Defective Format

Each filing improperly combines a “motion to dismiss” with a sworn personal affidavit. Under Rule 12(a)(4), such a motion tolls the time to answer only if the Court grants it, and no such grant occurred here.

5. Irrelevant and Improper Assertions

Instead of addressing the Complaint, Defendants:

- Make speculative and unqualified statements about Plaintiff’s mental health with no medical credentials or records.
- Continue to refer to Plaintiff as a “relative” despite Doc. 19 clarifying there is no active family relationship.
- Repeatedly reference an individual who is not a party to this action, despite formal clarification in Doc. 11-2 (Exhibit S) that third-party involvement is outside the scope of this case.
- Ignore the extensive documentary and sworn exhibits attached to the Complaint, including text messages, call records, and coordinated statements.

6. Breach of Granted Extension

Plaintiff granted Defendants an unopposed extension (Doc. 8) to obtain counsel. They used that grace period to prepare nearly identical filings that fail to address the claims and instead focus on personal attacks.

II. CONSEQUENCE — DEFAULT IS APPROPRIATE

Because these filings do not qualify as valid Answers under Rule 8(b), all factual allegations remain uncontested. Under Rule 55(b), the Court may enter default judgment when a defendant has “failed to plead or otherwise defend”, which is the case here.

**III. EXTENSION WAS GRANTED BASED ON REPRESENTATIONS THAT
WERE NEVER FULFILLED**

Plaintiff did not oppose Defendants' request for additional time, as they stated in their July 15 filing (Doc. 8):

"Defendants respectfully request an additional thirty [30] days... to obtain legal counsel, assess the legal sufficiency of the claims, and prepare an appropriate response." The Court granted that request. No attorney appeared. No filings were made that complied with the Rules. The extended deadline passed without any valid Answer being filed.

Under Fed. R. Civ. P. 6(b), extensions are granted for cause. That cause was not fulfilled. Defendants were granted grace, made representations to the Court, and failed to honor them. Plaintiff further notes the complete and prolonged silence of four geographically dispersed defendants, a synchronized lapse that may warrant procedural examination at a later stage.

IV. FAILURE-TO-ANSWER TABLES

Complaint ¶	Allegation	Jameka's "Answer"	Defect
¶ 12	Coordinated group chat harassment on April 23, 2025 (Exh. A)	Admits silence; claims context was "insane"; ignores that silence was strategic.	No factual rebuttal → admitted.
¶ 18	Acting as internal informant, relaying private medical info for manipulation (Exh. F, M)	Admits telling Vickie about surgery; downplays details; no denial of resulting harassment.	Confirms core fact → admitted.
¶ 22	Participation in coordinated campaign since 2022	Ignores earlier incidents; focuses on not texting Candace since "March 8 cutoff."	Partial denial, no evidence → admitted.
¶ 30	Targeting during medical vulnerability	No medical knowledge; passes health info; claims harmless intent.	Offers no factual defense → admitted.
¶ 35	Coordinated silence as collusion	Admits silence; disputes motive without proof; ignores broader pattern.	Unsupported motive argument → admitted.
¶ 38	Role in conspiracy with other defendants	Denies coordination but never addresses exhibits or timelines.	Unrebutted → admitted.

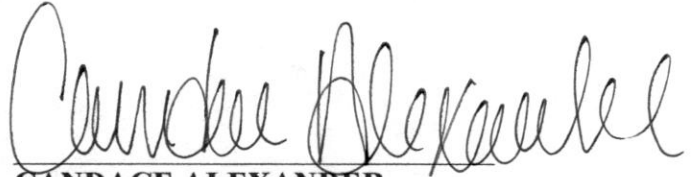
Complaint ¶	Allegation	Corey's "Answer"	Defect
¶ 12	Coordinated group chat harassment on April 23, 2025 (Exh. A)	Talks about unrelated criminal charge; ignores group chat and own threats.	Fails to admit/deny → admitted by default.
¶ 18	False affidavit w/ "fake police report" claim (Exh. K)	Denies filing false affidavit; offers no evidence; ignores Exhibit K.	No rebuttal → admitted by default.
¶ 22	Pattern of harassment dating to 2022	Claims case only about Keith's criminal charge; ignores earlier incidents.	Does not address scope → admitted.
¶ 25	Preemptive threat of continued legal abuse	Silent; no denial of threats in group chat (Exh. A).	Uncontested → admitted.
¶ 30	Targeting during medical vulnerability	No mention; offers no medical knowledge; speculates on mental health.	No factual rebuttal → admitted.
¶ 38	Role in coordinated campaign	Denies "coordinated conduct" but gives no evidence; repeats irrelevant criminal charge narrative.	Unsupported denial → admitted.

Complaint ¶	Allegation	Patrick's "Answer"	Defect
¶ 14	April 22, 2025 call to Candace as part of coordinated harassment (Exh. B)	Claims no contact for 5 years; ignores recorded April 22 call.	Contradicts evidence → admitted.
¶ 18	Supporting Corey's affidavit with direct outreach	Denies role; ignores call content aligning with affidavit timeline.	No factual rebuttal → admitted.
¶ 22	Participation in conspiracy with Corey, Jameka, and Vickie	Denies coordination; no evidence; fails to address exhibits.	Bare denial → admitted.
¶ 30	Emotional coercion during call	Denies coercion; admits telling Candace "people care about her."	Confirms central fact → admitted.
¶ 35	Targeting during family pressure campaign	No direct rebuttal; offers opinion on Candace's mental state.	Opinion, not fact → admitted.
¶ 38	Role in multi-state harassment effort	Ignores cited laws (MS, AL, MO); no alternate explanation.	Unrebutted → admitted.

Complaint ¶	Allegation	Vickie's "Answer"	Defect
¶ 16	April 23, 2025 group chat silence as tacit endorsement of Corey's affidavit	Admits silence; claims it was prayer and "spiritual messages."	Confirms core fact; motive irrelevant → admitted.
¶ 20	Use of spiritual guilt tactics to manipulate Candace	Claims she sends same messages to all children; no denial of timing/content linked to harassment timeline.	No factual rebuttal → admitted.
¶ 27	Participation in coordinated harassment with other defendants	Denies coordination; no evidence; ignores exhibits tying her to pattern.	Bare denial → admitted.
¶ 33	Breach of no-contact boundaries	Claims Candace added her to group chat; ignores prior no-contact stance and her silence's effect.	Deflection; no rebuttal of breach → admitted.
¶ 37	Spiritual harassment as coercive speech	Denies intent; ignores documented timing during vulnerability.	Intent irrelevant; conduct un rebutted → admitted.

WHEREFORE, Plaintiff respectfully requests that the Court:

- Strike each Defendant's filing as non-compliant with Rule 8(b);
- Enter default judgment against all Defendants under Rule 55(b); and
- Grant such other relief as the Court deems just and proper.

A handwritten signature in black ink, reading "Candace Alexander". The signature is written in a cursive, flowing style with a large initial "C".

CANDACE ALEXANDER

PRO SE PLAINTIFF

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